



December 13, 2011

• **Engineering**

• **Remediation**

• **Consulting**

Mr. Khai M. Dao
USEPA Region 3
1650 Arch Street (LC30)
Philadelphia, PA 19103-2029

**Re: Response to Comments / Modification to Cleanup Plan
Superior Tube Company, Collegeville, PA 19426**

Dear Mr. Dao:

Pursuant to our phone conversation on November 11, 2011, Environmental Alliance, Inc. (Alliance), on behalf of Superior Tube Company (STC), has prepared this letter in response to comments USEPA had on the Act 2 Cleanup Plan for the Superior Tube Company property in Collegeville, Pennsylvania ("the Site") dated July 13, 2011. The general comments, as we understand them, are presented below in bold type followed by a short narrative response.

1. Demonstration of plume stability will require at least eight consecutive quarters of groundwater sampling.

The Cleanup Plan requested that post-remediation groundwater monitoring continue for a period of one year (four consecutive quarters), or until such time as plume stability has been established. The reduction from the typical two years (eight consecutive quarters) to one year of attainment monitoring was based on the years of groundwater monitoring data that exists for the Site. STC understands that USEPA requires a minimum of eight consecutive quarters of post-remediation groundwater monitoring and will incorporate this change into the Cleanup Plan.

2. USEPA requires clarification of the approach outlined in the Cleanup Plan regarding actions following an exceedance of a site-specific standard at a point of compliance (POC) well during post remediation monitoring.

Paragraph 3, Section 6.1, of the Cleanup Plan reads:

“At any point, prior to or during post-remediation groundwater monitoring, should a POC well indicate an exceedance of the SSS, STC will conduct an appropriate site specific evaluation, which will include paired indoor air/subslab sampling and appropriate remedial action, if and as warranted (this decision matrix is depicted in Figure 11). Furthermore, if SSSs cannot be maintained at the POC in accordance with 250.702, then STC may perform one or more of the following:

1. Conduct appropriate fate and transport analysis and re-evaluate the existing SSS;
2. Extend the period of attainment monitoring until sufficient data exists that attainment can be demonstrated and a Final Report can be submitted;
3. Submit a Final Report with a Post Remediation Care Plan which includes additional groundwater monitoring. Once attainment can be demonstrated, a revision to the PRCP will be made;
4. Reinstitute active remediation.”

As discussed during our phone conversation, the course of action taken in response to an exceedance at a POC well is dependent on several factors, most notably, the degree of the exceedance, the reliability of the data, and the location of the POC well in relation to the potential receptor. Given the various site specific conditions that may be associated with any exceedance of the SSS that may occur, it is difficult to articulate the specific actions that may be warranted if such an exceedance occurs. For this reason, the Cleanup Plan was written to allow the remediator discretion and flexibility in determining what the appropriate responsible action should be to be protective of human health and the environment. Based on our discussion, Alliance, on behalf of STC, proposes to include the following detail to the Cleanup Plan:

“Should a POC well indicate an exceedance of an SSS, STC will re-sample the well within two weeks of receipt of the analytical results from the original sampling event. If the results of the re-sampling event confirm the exceedance, PADEP and USEPA will be notified of the results within 10 days. The notification will include a map depicting the location of the POC well(s) that reported the exceedance, its distance to the closest receptor, and the recent groundwater concentration trend for the well(s) (last four quarters of data). If the confirmed exceedance occurs at a POC well located within 200-ft of an occupied dwelling, or if the average of the two groundwater results exceeds the SSS by more than 25% at any POC well, a plan will be prepared that summarizes the groundwater results, concentration trends, and the recommended course of action. The plan will be submitted to both PADEP and USEPA within 30 days of the initial notification.”

3. A copy of the Act 2 Final Report should be submitted to USEPA.

The USEPA will be copied on submittal of the Act 2 Final Report to PADEP.

Environmental Alliance, Inc. has reviewed these comments and responses with PADEP Act 2 program staff, and by copy of this letter to Mr. Stephen Sinding, PADEP, requests that this letter response to USEPA comments serve as an Addendum / Modification to the Cleanup Plan (Alliance, July 2011), approved by PADEP on August 19, 2011. Specifically, the proposed paragraph above will replace the numbered list (1. through 4.) following the first full paragraph on page 5-7 and the third paragraph on page 6-1 of the Cleanup Plan.

If you have any questions regarding this submittal or require additional information, please contact me at (302) 234-4400.

Sincerely yours,

ENVIRONMENTAL ALLIANCE, INC.

A handwritten signature in black ink, appearing to read 'Joseph Rossi', with a stylized flourish at the end.

Joseph Rossi
Project Manager

c: Stephen Sinding, PADEP
Rick Warden, Superior Group
David Buzzell, Esquire, BBG
Rich Staron, PADEP

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